

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:

WESTMOUNT GROUP, INC.,

Debtor.

§
§
§
§
§

Case No. 21-30633-HCM-7

Chapter 7

**FIRST INTERIM APPLICATION FOR PAYMENT OF FEES AND EXPENSES OF
MULLIN HOARD & BROWN, L.L.P., AS COUNSEL FOR THE TRUSTEE**

This pleading requests relief that may be adverse to your interests.

If no timely response is filed within 21 days from the date of service, the relief requested herein may be granted without a hearing being held.

A timely filed response is necessary for a hearing to be held.

TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:

BRAD W. ODELL, Chapter 7 Trustee of the bankruptcy estate of Westmount Group, Inc. (“**Trustee**”), files this First Interim Application for Payment of Fees and Expenses of Mullin Hoard & Brown, L.L.P., as Counsel for the Trustee (the “**Application**”), pursuant to section 326 and 331 of title 11 of the United States Code (as amended, the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2016 of the Local Rules of the United States Bankruptcy Court for the Western District of Texas (the “**Bankruptcy Local Rule**”), seeking allowance on an interim basis of all the fees and expenses incurred by Mullin Hoard & Brown, L.L.P. (“**MHB**”) from October 29, 2021 through June 30, 2022 (the “**Compensation Period**”), in the amount of total amount of \$23,419.08 (\$20,052.50 for fees and \$3,366.58 for expenses) and in support of such Application would show the Court as follows:

I.
Factual Background

1. On August 23, 2021 (the “**Petition Date**”), Westmount Group, Inc. (the “**Debtor**”) filed a voluntary petition under chapter 11 of the Bankruptcy Code. The Debtor elected to proceed under Subchapter V of chapter 11. [Dkt. No. 1].

2. On August 28, 2021, the Office of the United States Trustee for Region 7 appointed Brad W. Odell as the Subchapter V Trustee. [Dkt. No. 5].

3. On October 26, 2021, the Court conducted a hearing on the First Amended Motion to Dismiss Case filed by Albert Flores. After considering the evidence and argument presented at the hearing, the Court granted the First Amended Motion to Dismiss Case and ordered that the Debtor’s bankruptcy case be converted from Chapter 11, Subchapter V to Chapter 7. The Court entered its Order Converting Case to Chapter 7 on October 27, 2021. [Dkt. No. 52].

4. On October 29, 2021, the Office of the United States Trustee for Region 7 appointed Brad W. Odell as the interim chapter 7 trustee in the Debtor’s converted Chapter 7 bankruptcy case. [Dkt. No. 57].

5. On November 8, 2021, the Trustee filed his *Application of Chapter 7 Trustee for an Order Authorizing Employment of Mullin Hoard & Brown, L.L.P. as Counsel for the Chapter 7 Trustee* (“**Employment Application**”). [Dkt. No. 71].

6. On December 16, 2021, the Court granting the Employment Application authorizing the Trustee to retain MHB as counsel to the Trustee as of October 29, 2021. [Dkt. No. 114].

7. At the time the Debtor’s bankruptcy case converted to chapter 7, the Debtor held in an account at Wells Fargo funds in the amount of \$10,054.54. These funds were released to the Trustee, and the Trustee has deposited them in an account in the name of the bankruptcy estate with

Axos Bank (the “**Estate Account**”).

8. Additionally, after counsel for the Debtor in the chapter 11 proceeding received approval to pay his fees from the retainer he received, Barron & Newburger, PC delivered to the Trustee the remaining retainer held by it in the amount of \$1,346.95. The Trustee has deposited this amount in Estate Account.

9. The bankruptcy estate of the Debtor consists of seven (7) promissory notes (the “**Promissory Notes**”) for various amounts. Three of the Promissory Notes are between the Debtor and an entity known as Westmount Assets, Inc. Two of the Promissory Notes are between the Debtor and an entity known as TRR 4133, Inc. One of the Promissory Notes is between the Debtor and an entity known as 71 Camille, Inc. And, one of the Promissory Notes is between the Debtor and an entity known as 538 East, Inc.

10. The Promissory Notes are secured by separate deeds of trust (“**DOTs**”) covering certain real property located in El Paso, Texas.

11. As of the filing of this Application, the Trustee has received payments on the Promissory Notes from the borrowers: Westmount Assets, Inc., TRR 4133, Inc., 71 Camille, Inc., and 538 East, Inc. (collectively, the “**Borrowers**”). The Trustee has deposited all payments on the Promissory Notes into the Estate Account.

12. As of the filing of this Application, the Estate Account holds \$50,792.05 in funds from the sources described above.

13. The Trustee files this Application for authority to pay to MHB the approved legal fees and expenses incurred by the Trustee for MHB’s representation of the Trustee in this bankruptcy case during the Compensation Period. This is the first application filed by the Trustee, and the Trustee seeks interim approval pursuant to 11 U.S.C. § 331.

II.
First Interim Application for Payment of Fees and Expenses

14. The Trustee seeks approval from the Court to pay to MHB its legal fees and expenses totaling \$23,419.08 (\$20,052.50 in attorney's fees and \$3,366.58 in expenses) incurred by MHB, from October 29, 2012 through June 30, 2022. This is the First Fee Application Under Section 331 that the Trustee has filed since the Court approved the employment of MHB more than 7 months ago. Accordingly, any hearing on this Application will be held more than 120 days after the Order granting the Employment Application was entered.

15. The Trustee seeks authority from the Court to allow the Trustee to pay MHB the approved fees and expenses from the Estate Account.

16. Attached hereto as Exhibit "A" is the Fee Application Summary required pursuant to Bankruptcy Local Rule 2016, which provides the Court with a synopsis of the total compensation and fees requested pursuant to this Application.

17. MHB maintains two file numbers for the work it is performing for the Trustee in this bankruptcy case. File number 18797.01 relates to the Trustee's pursuit of preferential transfers by the Debtor to Keyvan Parsa and Techrover, Inc. File number 18797.02 relates to the Trustee's investigation and pursuit of potential fraudulent transfers by the Debtor to the Borrowers, and collection efforts on the Promissory Notes.

18. Attached hereto as Exhibit "B" is a copy of MHB's billing statements for file number 18797.01. For work performed by MHB under file number 18797.01, MHB has incurred \$8,241.00 in fees and \$1,421.21 in expenses for a total of \$9,662.21.

19. Attached hereto as Exhibit "C" is a copy of MHB's billing statements for file number 18797.02. For work performed by MHB under file number 18797.02, MHB has incurred \$11,811.50

in fees and \$1,945.37 in expenses for a total of \$13,756.87.

20. Attached hereto as Exhibit “D” is a copy of the invoices for expenses over \$100 as required by Bankruptcy Local Rule 2016. These expenses relate to court filing fees, process server expenses, title reports, and legal research expenses. All other expenses are set forth on the billing statements attached as Exhibits “B” and “C.”

III.

Description of Services Provided to the Trustee

11. During the eight-month period for which approval of fees and expenses is sought, MHB, has performed a number of services on behalf of the Trustee. The following is a brief synopsis of the types of matters that have been handled on behalf of the Trustee:

1. **Representation of Trustee in Preference Matters (18797.01):** This includes, but is not limited, to work associated with attending 341 meeting and assisting Trustee with questioning of Debtor’s principal about transfers made prior to filing of bankruptcy case; analyzing evidence of preferential transfers; preparing and sending demand letters to recipients of preferential transfers; preparing, filing, and serving complaint for avoidance of preferential transfers; preparing and filing motion for entry of default; preparing and filing motion for entry of default judgment.
(DL: 2.80 hours @ \$450.00/hour = \$1,260.00; BO: 10.80 hours @ \$350.00/hour = \$3,780.00; CCE: 8.80 hours @ \$225.00/hour = \$1,980.00; ME: 7.40 hours @ \$165.00/hour = \$1,221.00)
2. **Representation of Trustee in Fraudulent Transfer Matters (18797.02):** This includes, but is not limited, analyzing potential claims and theories of recovery for fraudulent transfers done by the Debtor prior to the filing of the bankruptcy case; analyzing title reports and other documents relating to the Promissory Notes and DOTs; drafting demand letters for defaults under the DOTs; preparing complaint against recipients of potential fraudulent transfers; settlement negotiations with several of the Borrowers.
(DL: 0.80 hours @ \$450.00/hour = \$360.00; BO: 19.00 hours @ \$350.00/hour = \$6,650.00; AS: 0.30 hours @ \$300.00/hour = \$90.00; CCE: 13.90 hours @ \$225.00/hour = \$3,127.50; ME: 1.40 hours @ \$165.00/hour = \$231.00; NMK: 12.30 hours @ \$110.00/hour = \$1,353.00)

IV.

Analysis of Factors Under 11 U.S.C. §330 and §331 Related to Reasonable Compensation for Actual and Necessary Services Rendered

12. Pursuant to 11 U.S.C. §331, in determining the amount of reasonable compensation to be awarded to an attorney, the Court shall consider the nature, extent and the value of such services, taking into account all relevant factors, including: (1) the time spent on such services; (2) the rates charged for such services; (3) whether the services were necessary to the administration of, or beneficial at the time which the service was rendered toward the completion of a case under this title; (4) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and (5) whether the compensation is reasonable, based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title. The Court under 11 U.S.C. §331 is to disallow compensation for (1) unnecessary duplication of services; (2) services not reasonably likely to benefit the debtor's estate; (3) or unnecessary to the administration of the debtor's estate.

1. **Time Spent on Services and Rates Charged for Such Services:** MHB has expended a significant amount of time in the representation of the Trustee as counsel in this bankruptcy proceeding to administer the estate, including causes of action owned by the estate, and to recover as much as possible for the Debtor's creditors. In the time period that is covered by this Application, MHB's attorneys and paraprofessionals have expended a total of 77.50 hours in connection with this case within the eight months for which compensation is sought. The time that has been spent on this case by the attorneys and paraprofessionals that work for the firm is more specifically broken down as follows:

Attorney/Paralegal	Hours Spent	Hourly Rate	Total
David R. Langston	3.60	\$450.00	\$1,620.00
Brad W. Odell	29.80	\$350.00	\$10,430.00
M. Andrew Stewart	0.30	\$300.00	\$90.00
Clay Elliott	22.70	\$225.00	\$5,107.50
Mitzi Emert	8.80	\$165.00	\$1,452.00
Law Clerk	12.30	\$110.00	\$1,353.00
TOTAL:	77.50		\$20,052.50

The specific information contained on the attached Exhibits "B" and "C" are a synopsis of the particular services rendered, as well as the amount of time expended on providing services to the Trustee by each particular attorney or paraprofessional of the firm. Each entry of the time records attached represents actual time expended in the performance of legal work that was required in order to properly represent the Trustee. The firm is also in the practice of using its fair discretion in billing its clients meaning that the firm takes into consideration the complexity of the task before assigning it to any given attorney and

generally uses senior attorneys to supervise associates who are capable of performing the same types of services at lower rates. In this instance, the firm has used both of these practices in an effort to keep its fees and expenses to a minimum. The Firm believes that the amount of time expended by each attorney or paraprofessional on each entry is reasonable and necessary in light of the facts and legal complexities of the case.

2. **Whether the Services Performed Were Necessary or Beneficial at the Time that the Services Were Rendered Toward Completion of the Case.** All the services that have been performed thus far by MHB, on behalf of the Trustee, have been necessary for the effective administration of the bankruptcy estate and have been beneficial at the time that the services were rendered toward completion of the case. MHB has taken all steps it believes are reasonably necessary to assure that the work it is performing as counsel to the Trustee is not duplicative of the Trustee's work or falls in a category of the duties and responsibilities of the Trustee. During the eight months MHB has been counsel for the Trustee, the firm has expended 77.50 hours on the case. During this period of time the Firm has provided the following services which benefited the estates:

- Analyzed claims the bankruptcy estate may have against third parties for preferential and fraudulent transfers;
- Prosecuted and acquired judgments against two recipients of preferential transfers in amounts greater than \$630,000.00;
- Analyzed the legal rights of the Trustee under the Promissory Notes and DOTs and advised Trustee of same;
- Made demand against Borrowers for defaults under the DOTs to assure compliance with the covenants required under the DOTs;
- Analyzed and advised Trustee on available remedies for fraudulent transfers; and
- Commenced settlement negotiations with several of the Borrowers.

3. **Whether the Services Were Performed Within a Reasonable Amount of Time Commensurate with the Complexity, Importance and Nature of the Problem, Issue or Task Addressed.** The services were performed on behalf of the Trustee within a reasonable amount of time commensurate with the complexity, importance and nature of the problem, issue or task addressed. The assets of the bankruptcy estate consist of the Promissory Notes and DOTs, and several chapter 5 causes of action. The chapter 5 causes of action in this bankruptcy case are complex and factually intricate. Additionally, the potential remedies for the avoidance of any chapter 5 causes of action are complex. The Trustee asserts that a reasonable and cost-efficient amount of time was expended on the various legal issues and challenges which have confronted this bankruptcy estate and as a result the Trustee has been able to move the administration of the bankruptcy estate in a timely fashion toward liquidation of the assets.

4. **Whether the Compensation is Reasonable, based On the Customary Compensation Charged by Comparably Skilled Practitioners in Cases Other than Cases Under this Title.** In this particular case, the compensation sought is reasonable considering the customary compensation charged by comparably skilled practitioners in

other cases other than cases under this title. Specifically, the majority of the services that were performed in this case were completed by one of the firm's partners with the firm who has over fourteen (14) years of experience working in the area of bankruptcy. For his services, the firm charged a rate of \$350.00 an hour. Additionally, the firm has properly delegated certain tasks – legal research, preliminary drafting of pleadings, etc. – to associate attorneys and paraprofessionals. The rates for junior attorneys and paraprofessionals ranges from \$110.00/hour to \$225.00/hour. It has been the experience of the firm that for similar services of partners, associate, and paraprofessionals with similar qualifications, the hourly rates charged range from \$200.00 to \$750.00 an hour. Compared with skilled practitioners in cases other than cases under this title, the fees would be reasonable as the rates are similar if not higher for the services performed by attorneys and paraprofessionals in complex commercial litigation cases or in completing complex transactional work. Furthermore, the rates charged by the firm for services performed for clients in the bankruptcy area for a case of this magnitude might actually be less in comparison to the rates charged by law firms in larger cities such as Austin, Dallas, and Houston. In surveying fees that are charged by bankruptcy practitioners in this area, the firm submits that these hourly rates are not excessive. Such fees have been approved by this Court in similar proceedings, and the firm believes that they are reasonable and necessary in light of the specific nature of the issues involved in these proceedings, and the specific degree of skill and knowledge necessary to competently represent the Trustee in this case.

WHEREFORE, PREMISES CONSIDERED, the Trustee requests that the Court grant the First Interim Application for Payment of Fees and Expenses of Mullin Hoard & Brown, L.L.P., as Counsel for the Trustee, approve the legal fees and expenses of Mullin Hoard & Brown, L.L.P. in the amount of \$23,419.08 (\$20,052.50 in fees and \$3,366.58 in expenses) for the time period of October 29, 2021 through June 30, 2022, and authorize the Trustee to pay from the Estate Account the amount of approved fees and expenses to MHB, and for such other and further relief whether at law or in equity as the Court may deem necessary and proper under the circumstances.

Respectfully Submitted,

By: /s/Brad W. Odell
Brad W. Odell

Mullin Hoard & Brown, LLP
Brad W. Odell, SBN: #24065839
P.O. Box 2585
Lubbock, TX 79408
Tel: 806-765-7491
Fax: 806-765-0553
bodell@mhba.com
Chapter 7 Trustee

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Application was served on the following parties in the manner indicated below on the 2nd day of August, 2022:

1. A full and complete copy of the foregoing Application, along with the Fee Application Summary attached as Exhibit "A" was served via ECF notification on all parties listed on the attached Exhibit "E".
2. Pursuant to Local Rule 2016(b)(1) and Local Rule 9013(c)(3), all parties listed on the attached Exhibit "F" received a copy of the Fee Application Summary, attached to the Motion as Exhibit "A", via regular U.S. Mail, postage prepaid.

/s/ Brad W. Odell
Brad W. Odell

EXHIBIT "A"
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

IN RE:	§	
	§	
WESTMOUNT GROUP, INC.,	§	Case No. 21-30633-HCM-7
	§	
Debtor.	§	Chapter 7

FEE APPLICATION SUMMARY

- I. CLIENT: Brad W. Odell, Chapter 7 Trustee
- II. REQUESTING APPLICANT/FIRM: Mullin Hoard & Brown, L.L.P., attorneys for the Trustee
- III. TOTAL AMOUNT OF FEES REQUESTED:
- a. Fees: \$20,052.50
 - b. Expenses: \$3,366.58
 - c. Retainer: None
 - d. Time Period Covered: October 29, 2021 to June 30, 2022
- IV. BREAKOUT OF CURRENT APPLICATION

Name/Capacity	Hours Spent	Hourly Rate	Total
David R. Langston, Partner	3.60	\$450.00	\$1,620.00
Brad W. Odell, Partner	29.80	\$350.00	\$10,430.00
M. Andrew Stewart, Partner	0.30	\$300.00	\$90.00
Clay Elliott, Associate	22.70	\$225.00	\$5,107.50
Mitzi Emert, Paralegal	8.80	\$165.00	\$1,452.00
Law Clerk	12.30	\$110.00	\$1,353.00
TOTAL:	77.50		\$20,052.50

MINIMUM FEE INCREMENTS: Mullin Hoard & Brown, L.L.P. bills time in tenth of hours.

EXPENSES: Mullin Hoard & Brown, L.L.P. is requesting \$3,366.58 in expenses. MHB charges \$.20 per page for photocopying; mileage at \$.535; and all other expenses are based on actual charges (no premium) for expenses incurred, including long distance telephone calls, postage, reimbursement of travel expenses and charges for services by third parties. Below is a summary of the expenses charged:

Copy Charges	\$45.40
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Long Distance Phone Charges	\$2.00
Court Costs	\$350.00
Secretary of State	\$4.00
Process Server Fees	\$223.51
Westlaw	\$1,767.43
Title Reports	\$974.24
TOTAL:	\$3,366.58

AMOUNT ALLOCATED FOR PREPARATION OF THIS FEE APPLICATION: MHB has not billed time for the preparation of this fee application as of the time of filing. Fees and expenses incurred for the preparation of this fee application will be included in invoices at a later time.

V. PRIOR APPLICATIONS: No prior fee applications have been filed.

VI. OTHER CO-EQUAL OR ADMINISTRATIVE CLAIMANTS IN THIS CASE:

a. Brad W. Odell, as Subchapter V Trustee in case prior to conversion.

Allowance of MHB's Fee Application will not result in the Debtor's estate not being able to pay all co-equal or administrative claims in this case.

VII. RESULTS OBTAINED:

1. **Representation of Trustee in Preference Matters (18797.01):** This includes, but is not limited, to work associated with attending 341 meeting and assisting Trustee with questioning of Debtor's principal about transfers made prior to filing of bankruptcy case; analyzing evidence of preferential transfers; preparing and sending demand letters to recipients of preferential transfers; preparing, filing, and serving complaint for avoidance of preferential transfers; preparing and filing motion for entry of default; preparing and filing motion for entry of default judgment.
(DL: 2.80 hours @ \$450.00/hour = \$1,260.00; BO: 10.80 hours @ \$350.00/hour = \$3,780.00; CCE: 8.80 hours @ \$225.00/hour = \$1,980.00; ME: 7.40 hours @ \$165.00/hour = \$1,221.00)
2. **Representation of Trustee in Fraudulent Transfer Matters (18797.02):** This includes, but is not limited, analyzing potential claims and theories of recovery for fraudulent transfers done by the Debtor prior to the filing of the bankruptcy case; analyzing title reports and other documents relating to the Promissory Notes and DOTs; drafting demand letters for defaults under the DOTs; preparing complaint against recipients of potential fraudulent transfers; settlement negotiations with several of the Borrowers.
(DL: 0.80 hours @ \$450.00/hour = \$360.00; BO: 19.00 hours @ \$350.00/hour = \$6,650.00; AS: 0.30 hours @ \$300.00/hour = \$90.00; CCE: 13.90 hours @ \$225.00/hour = \$3,127.50; ME: 1.40 hours @ \$165.00/hour = \$231.00; NMK: 12.30 hours @ \$110.00/hour = \$1,353.00)

EXHIBIT “B”

MHB Billing Statements for 18797.01



**P. O. BOX 31656
AMARILLO, TX 79120-1656
806-372-5050**

TAX ID #75-2319090

*****INVOICE*****

Brad W. Odell, Chapter 7 Trustee
1500 Broadway, Suite 700
Lubbock, TX 79401

Page: 1
Invoice Date: April 13, 2022
Account No.: 18797.01
Invoice No.: 1

Keyvan Parsa and Techrover, Inc.

FEES

		HOURS
11/29/2021		
DL	Meeting with Brad Odell regarding attendance at First Meeting of Creditors.	0.20
11/30/2021		
DL	Preparation and attendance at 341 Meeting via conference call with Brad Odell.	1.00
12/08/2021		
DL	Conference with Brad Odell and received update on status of case following hearing on withdrawal of attorney for Debtor.	0.30
12/17/2021		
BO	Revised demand letters on preference and fraudulent transfers.	0.60
ME	Work on drafts of demand letters to Parsa and Techrover.	1.00
01/13/2022		
ME	Research information to begin work on complaint.	1.00
01/14/2022		
ME	Work on drafting of complaint.	2.20
01/18/2022		
BO	Communications with K. Parsa regarding response to demand letters for Techrover and K. Parsa, individually.	0.20
02/16/2022		
BO	Analyzed bank statements and records received from Debtor for complaints on preferential and fraudulent transfers; worked on complaint against K. Parsa and Techrover.	2.00

INVOICE DUE UPON RECEIPT

PLEASE INDICATE ACCOUNT NUMBER ON REMITTANCE

PAYMENTS RECEIVED AFTER DATE OF THIS STATEMENT ARE NOT REFLECTED ON THIS INVOICE

Brad W. Odell, Chapter 7 Trustee
Keyvan Parsa and Techrover, Inc.

Page: 2
Invoice Date: April 13, 2022
Account No.: 18797.01
Invoice No.: 1

HOURS

02/24/2022

DL	Attention to email exchanges between K. Parson and Brad Odell; discussions with Brad regarding next steps.	0.50	
BO	Communications with K. Parsa regarding demands on preferences and notes.	0.40	
	FOR CURRENT SERVICES RENDERED	9.40	2,713.00

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
David Langston	2.00	\$450.00	\$900.00
Brad Odell	3.20	350.00	1,120.00
Mitzi Emert	4.20	165.00	693.00

TOTAL CURRENT WORK 2,713.00

BALANCE DUE UPON RECEIPT \$2,713.00



**P. O. BOX 31656
AMARILLO, TX 79120-1656
806-372-5050**

TAX ID #75-2319090

*****INVOICE*****

Brad W. Odell, Chapter 7 Trustee
1500 Broadway, Suite 700
Lubbock, TX 79401

Page: 1
Invoice Date: May 5, 2022
Account No.: 18797.01
Invoice No.: 2

Keyvan Parsa and Techrover, Inc.

FEES

		HOURS	
04/14/2022			
BO	Finalized complaint for avoidance claims against Techrover, Inc. and Keyvan Parsa.	1.50	
04/15/2022			
DL	Review and revise draft of Original Complaint to Recover Preferences and Fraudulent Conveyance.	0.50	
04/19/2022			
ME	Prepare Adversary Proceeding Cover Sheet; Prepare Summons; Call to clerk to discuss procedure for issuance of Summons. Finalize and file Complaint; Work on arranging for process server to serve complaint on Defendants.	1.60	
04/20/2022			
DL	Conference with Brad Odell and Mitzi Emert regarding service of Complaint; conference with Brad Odell regarding settlement discussions with C. Morada.	0.30	
04/22/2022			
ME	Email to process server on status of getting complaint served.	0.10	
04/27/2022			
ME	File COS on Summons and Complaint to Techrover and Parsa.	0.60	
	FOR CURRENT SERVICES RENDERED	4.60	1,264.50

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
David Langston	0.80	\$450.00	\$360.00

INVOICE DUE UPON RECEIPT
PLEASE INDICATE ACCOUNT NUMBER ON REMITTANCE
PAYMENTS RECEIVED AFTER DATE OF THIS STATEMENT ARE NOT REFLECTED ON THIS INVOICE

Brad W. Odell, Chapter 7 Trustee
Keyvan Parsa and Techrover, Inc.

Page: 2
Invoice Date: May 5, 2022
Account No.: 18797.01
Invoice No.: 2

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Brad Odell	1.50	350.00	525.00
Mitzi Emert	2.30	165.00	379.50

EXPENSES

04/19/2022	Long distance telephone call, from ext 104, 1(915)779-7362	0.16
04/19/2022	Long distance telephone call, from ext 104, 1(915)584-3773	0.16
04/19/2022	Long distance telephone call, from ext 104, 1(915)546-5288	0.16
04/19/2022	Long distance telephone call, from ext 104, 1(915)229-4050	0.40
04/20/2022	Photocopying, 32, 32 pp @ \$0.20 each	6.40
	TOTAL EXPENSES	7.28
	TOTAL CURRENT WORK	1,271.78
	PREVIOUS BALANCE	\$2,713.00
	BALANCE DUE UPON RECEIPT	<u>\$3,984.78</u>



**P. O. BOX 31656
AMARILLO, TX 79120-1656
806-372-5050**

TAX ID #75-2319090

*****INVOICE*****

Brad W. Odell, Chapter 7 Trustee
1500 Broadway, Suite 700
Lubbock, TX 79401

Page: 1
Invoice Date: June 9, 2022
Account No.: 18797.01
Invoice No.: 3

Keyvan Parsa and Techrover, Inc.

FEES

		HOURS	
05/23/2022			
CCE	Analyzed complaint for filing entry of default. Drafted request for entry of default.	4.00	
05/25/2022			
BO	Revised and finalized motion for entry of default judgment against Techrover, Inc. and Keyvan Parsa.	2.50	
05/26/2022			
ME	Call to Clerk regarding filing of Request For Entry of Default. Prepare exhibits; Finalize and file Request For Entry of Default.	0.80	
	FOR CURRENT SERVICES RENDERED	7.30	1,907.00

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Brad Odell	2.50	\$350.00	\$875.00
Mitzi Emert	0.80	165.00	132.00
Clay Elliott	4.00	225.00	900.00

EXPENSES

05/27/2022	Payment to West Payment Center - West Online Research charge for period of 04/01/22 - 04/30/22.	631.12
05/31/2022	Payment to Cardmember Services - ASAP Process Service fee for Keyvan Parsa, 04/19/22.	69.12
05/31/2022	Payment to Cardmember Services - ASAP Process Service fee for Techrover, Inc., 04/19/22.	154.39
05/31/2022	Payment to Cardmember Services - U.S. Bankruptcy Court fee, 04/19/22.	350.00
05/31/2022	Photocopying, 117, 117 pp @ \$0.20 each	23.40

INVOICE DUE UPON RECEIPT

PLEASE INDICATE ACCOUNT NUMBER ON REMITTANCE

PAYMENTS RECEIVED AFTER DATE OF THIS STATEMENT ARE NOT REFLECTED ON THIS INVOICE

Brad W. Odell, Chapter 7 Trustee
Keyvan Parsa and Techrover, Inc.

Page: 2
Invoice Date: June 9, 2022
Account No.: 18797.01
Invoice No.: 3

TOTAL EXPENSES	<u>1,228.03</u>
TOTAL CURRENT WORK	3,135.03
PREVIOUS BALANCE	\$3,984.78
BALANCE DUE UPON RECEIPT	<u>\$7,119.81</u>



**P. O. BOX 31656
AMARILLO, TX 79120-1656
806-372-5050**

TAX ID #75-2319090

*****INVOICE*****

Brad W. Odell, Chapter 7 Trustee
1500 Broadway, Suite 700
Lubbock, TX 79401

Page: 1
Invoice Date: July 13, 2022
Account No.: 18797.01
Invoice No.: 4

Keyvan Parsa and Techrover, Inc.

FEES

		HOURS	
06/10/2022			
ME	Email Court regarding entry of default.	0.10	
06/24/2022			
CCE	Began drafting motion for default.	1.60	
06/28/2022			
BO	Worked on acquiring evidence in support of motion for default judgment and hearing. - n/c		
CCE	Continued work on motion for default judgment, supporting affidavits, and order granting default judgment.	3.20	
06/30/2022			
BO	Revised motion for default judgment; revised affidavit; revised order granting same; drafted default judgment.	3.60	
	FOR CURRENT SERVICES RENDERED	8.50	2,356.50

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Brad Odell	3.60	\$350.00	\$1,260.00
Mitzi Emert	0.10	165.00	16.50
Clay Elliott	4.80	225.00	1,080.00

EXPENSES

06/30/2022	Payment to West Payment Center - West Online Research charge for period of 05/01/22 - 05/31/22.	181.90
06/30/2022	Photocopying, 20, 20 pp @ \$0.20 each	4.00
	TOTAL EXPENSES	185.90

INVOICE DUE UPON RECEIPT

PLEASE INDICATE ACCOUNT NUMBER ON REMITTANCE

PAYMENTS RECEIVED AFTER DATE OF THIS STATEMENT ARE NOT REFLECTED ON THIS INVOICE

Brad W. Odell, Chapter 7 Trustee
Keyvan Parsa and Techrover, Inc.

Page: 2
Invoice Date: July 13, 2022
Account No.: 18797.01
Invoice No.: 4

TOTAL CURRENT WORK	2,542.40
PREVIOUS BALANCE	\$7,119.81
BALANCE DUE UPON RECEIPT	<u>\$9,662.21</u>

EXHIBIT “C”

MHB Billing Statements for 18797.02



**P. O. BOX 31656
AMARILLO, TX 79120-1656
806-372-5050**

TAX ID #75-2319090

*****INVOICE*****

Brad W. Odell, Chapter 7 Trustee
1500 Broadway, Suite 700
Lubbock, TX 79401

Page: 1
Invoice Date: April 13, 2022
Account No.: 18797.02
Invoice No.: 1

Westmount Assets and Others

FEES

		HOURS
12/16/2021		
DL	Conference with Brad Odell regarding preparing demand letters to creditors who received transfers.	0.20
01/24/2022		
BO	Analyzed deeds of trust and promissory notes for default provisions; worked on demand letters to purported borrowers.	1.50
ME	Work on drafts of letters to Carlos Miranda and Dr. Parsa.	1.40
DL	Receipt and review of draft of letter to Carlos Miranda.	0.30
01/27/2022		
BO	Revised demand letters to purported borrowers.	1.00
01/28/2022		
BO	Finalized demand letters and sent same.	0.90
02/02/2022		
NMK	Discussed research matter with Brad and began preliminary research.	2.00
02/04/2022		
NMK	Conducted broad research on the recovery available for a fraudulent transfer claim.	2.50
02/10/2022		
NMK	Continued to search for case law supporting our position on recovery. Completed drafting the memo providing an opinion on which theory of recovery will provide the best outcome.	4.80
02/14/2022		
BO	Conference with law clerk regarding analysis of remedies	

INVOICE DUE UPON RECEIPT

PLEASE INDICATE ACCOUNT NUMBER ON REMITTANCE

PAYMENTS RECEIVED AFTER DATE OF THIS STATEMENT ARE NOT REFLECTED ON THIS INVOICE

Brad W. Odell, Chapter 7 Trustee
Westmount Assets and Others

Page: 2
Invoice Date: April 13, 2022
Account No.: 18797.02
Invoice No.: 1

		HOURS	
	on fraudulent transfer claims; revised demand letter to TRR 4133, Inc., 538 East, Inc., and 71 Camille, Inc.	2.20	
02/23/2022			
BO	Call with J. Truly regarding demand letter on Rutter Entities.	0.20	
03/02/2022			
BO	Call with C. Miranda regarding demand letter and proposal.	0.10	
03/11/2022			
NMK	Researched damages available upon a claim of fraudulent transfer including the broad legal rules as well as explanatory cases.	3.00	
BO	Worked on complaint for preferential transfers.	1.70	
03/14/2022			
DL	Review of draft letter to Carlos Miranda regarding accounting and payment information on promissory notes; discussion regarding drafting causes of action in adversary proceeding.	0.30	
03/30/2022			
CCE	Conversation with Brad Odell regarding research on fraud.	0.40	
	FOR CURRENT SERVICES RENDERED	22.50	4,694.00

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
David Langston	0.80	\$450.00	\$360.00
Brad Odell	7.60	350.00	2,660.00
Mitzi Emert	1.40	165.00	231.00
Clay Elliott	0.40	225.00	90.00
Nicholas Kowalski	12.30	110.00	1,353.00

TOTAL CURRENT WORK 4,694.00

BALANCE DUE UPON RECEIPT \$4,694.00



**P. O. BOX 31656
AMARILLO, TX 79120-1656
806-372-5050**

TAX ID #75-2319090

*****INVOICE*****

Brad W. Odell, Chapter 7 Trustee
1500 Broadway, Suite 700
Lubbock, TX 79401

Page: 1
Invoice Date: May 5, 2022
Account No.: 18797.02
Invoice No.: 2

Westmount Assets and Others

FEES

		HOURS
04/01/2022		
CCE	Worked on Memorandum regarding fraudulent transfers and remedies available. (Actual 3.00; Billed 1.50)	1.50
04/05/2022		
CCE	Analyze ability of trustee to foreclose deed of trust based on fraud.	1.00
04/06/2022		
CCE	Conference with B. Odell regarding analysis of 550.	1.00
04/12/2022		
CCE	Analyzed elements to acquire equitable lien.	4.00
04/13/2022		
CCE	Analyzed facts of case to standard in acquiring an equitable lien. (Actual 1.90; Billed 1.00)	1.00
04/14/2022		
BO	Analyzed utility in acquiring title runs on properties; analyzed deeds of trust.	0.60
CCE	Analyzed adequate remedy element under equitable lien standard of facts.	2.00
04/18/2022		
CCE	Finalized analysis of facts to equitable lien standard and drafted memo; provided same to B. Odell. (Actual 5.50; Billed 3.00)	3.00
BO	Analyzed memo regarding remedies available for fraudulent transfers; analyzed cases.	1.40

INVOICE DUE UPON RECEIPT

PLEASE INDICATE ACCOUNT NUMBER ON REMITTANCE

PAYMENTS RECEIVED AFTER DATE OF THIS STATEMENT ARE NOT REFLECTED ON THIS INVOICE

Brad W. Odell, Chapter 7 Trustee
Westmount Assets and Others

Page: 2
Invoice Date: May 5, 2022
Account No.: 18797.02
Invoice No.: 2

		HOURS	
04/19/2022			
BO	Worked on complaint for fraudulent transfers.	1.00	
AS	Work with Brad Odell on analysis of fraudulent transfer and lending issues as well as possible Section 363 sale of notes receivable	0.30	
04/20/2022			
BO	Settlement conference with C. Miranda and D. Rutter; conference with D. Langston on settlement offer.	0.70	
04/21/2022			
BO	Worked on valuation of real property securing promissory notes.	0.40	
04/26/2022			
BO	Worked on title issues to real property that secures promissory notes.	0.40	
04/29/2022			
BO	Analyzed settlement offer from Rutter Entities; communications with C. Miranda regarding appraisals; analyzed notes regarding defaults. (Actual 1.60; Billed 1.00)	1.00	
	FOR CURRENT SERVICES RENDERED	19.30	5,052.50

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Andy Stewart	0.30	\$300.00	\$90.00
Brad Odell	5.50	350.00	1,925.00
Clay Elliott	13.50	225.00	3,037.50

EXPENSES

04/13/2022	Photocopying, 21, 21 pp @ \$0.20 each	4.20
04/19/2022	Long distance telephone call, from ext 101, 1(915)533-4424	0.48
04/20/2022	Long distance telephone call, from ext 101, 1(915)533-4424	0.16
04/20/2022	Photocopying, 21, 21 pp @ \$0.20 each	4.20
04/21/2022	Long distance telephone call, from ext 101, 1(915)588-7484	0.16
04/22/2022	Long distance telephone call, from ext 101, 1(915)588-7484	0.32
	TOTAL EXPENSES	9.52
	TOTAL CURRENT WORK	5,062.02
	PREVIOUS BALANCE	\$4,694.00
	BALANCE DUE UPON RECEIPT	<u>\$9,756.02</u>



**P. O. BOX 31656
AMARILLO, TX 79120-1656
806-372-5050**

TAX ID #75-2319090

*****INVOICE*****

Brad W. Odell, Chapter 7 Trustee
1500 Broadway, Suite 700
Lubbock, TX 79401

Page: 1
Invoice Date: June 9, 2022
Account No.: 18797.02
Invoice No.: 3

Westmount Assets and Others

FEES

		HOURS	
05/02/2022			
BO	Conference with D. Langston regarding settlement offer; worked on complaint against Westmount Assets and Techrover.	1.30	
05/09/2022			
BO	Conference with D. Langston regarding settlement counteroffer; sent counteroffer to C. Miranda regarding settlement of claims against Rutter Entities.	0.70	
05/11/2022			
BO	Analyzed reports on valuation of collateral behind Rutter Entities.	1.70	
05/12/2022			
BO	Call with counsel for creditors regarding potential settlement discussions.	0.50	
05/20/2022			
BO	Analyzed title reports on properties securing notes.	1.50	
	FOR CURRENT SERVICES RENDERED	5.70	1,995.00

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Brad Odell	5.70	\$350.00	\$1,995.00

EXPENSES

05/11/2022	Photocopying, 16, 16 pp @ \$0.20 each	3.20
05/17/2022	Payment to Allegiance Title Company - Property Report/ 4500 Frankfort, El Paso County, TX.	135.31

INVOICE DUE UPON RECEIPT

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PAYMENTS RECEIVED AFTER DATE OF THIS STATEMENT ARE NOT REFLECTED ON THIS INVOICE

Brad W. Odell, Chapter 7 Trustee
Westmount Assets and Others

Page: 2
Invoice Date: June 9, 2022
Account No.: 18797.02
Invoice No.: 3

05/17/2022	Payment to Allegiance Title Company - 4537 Skylark Way, El Paso County, TX.	135.31
05/17/2022	Payment to Allegiance Title Company - Property Report/ 4325 Leeds, El Paso County, TX.	135.31
05/17/2022	Payment to Allegiance Title Company - Property Report/ 538 East Road, El Paso County, TX.	135.31
05/17/2022	Payment to Allegiance Title Company - Property Report/ 71 Camille Drive, El Paso County, TX.	162.38
05/17/2022	Payment to Allegiance Title Company - Property Report/ 3320 Montana Ave., El Paso County, TX.	135.31
05/17/2022	Payment to Allegiance Title Company - Property Report / 9532 Charleston, El Paso County, TX.	135.31
05/27/2022	Payment to West Payment Center - West Online Research charge for period of 04/01/22 - 04/30/22.	954.41
05/27/2022	Payment to Secretary of State (FINANCIAL MGMT) - Texas Secretary of State charge for period of 04/01/22 - 04/30/22.	4.00
	TOTAL EXPENSES	1,935.85
	TOTAL CURRENT WORK	3,930.85
	PREVIOUS BALANCE	\$9,756.02
	BALANCE DUE UPON RECEIPT	<u>\$13,686.87</u>



**P. O. BOX 31656
AMARILLO, TX 79120-1656
806-372-5050**

TAX ID #75-2319090

*****INVOICE*****

Brad W. Odell, Chapter 7 Trustee
1500 Broadway, Suite 700
Lubbock, TX 79401

Page: 1
Invoice Date: July 13, 2022
Account No.: 18797.02
Invoice No.: 4

Westmount Assets and Others

FEES

		HOURS	
06/08/2022			
BO	Communications with C. Miranda regarding payments on notes and settlement discussions.	0.20	
	FOR CURRENT SERVICES RENDERED	0.20	70.00

		<u>RECAPITULATION</u>		
<u>TIMEKEEPER</u>		<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Brad Odell		0.20	\$350.00	\$70.00

TOTAL CURRENT WORK	70.00
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PREVIOUS BALANCE	\$13,686.87
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BALANCE DUE UPON RECEIPT	<u>\$13,756.87</u>
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INVOICE DUE UPON RECEIPT
PLEASE INDICATE ACCOUNT NUMBER ON REMITTANCE
PAYMENTS RECEIVED AFTER DATE OF THIS STATEMENT ARE NOT REFLECTED ON THIS INVOICE

EXHIBIT “D”

**REIMBURSEMENT SUPPORT EXHIBIT
(Detailed Expenses in Excess of \$100.00)**

Client 18797.01									
User Name ELLIOTT, CLAY (21274085)									
Day 04/01/2022									
Included									
MULTI-SEARCH DOCUMENT DISPLAYS	1				153.00 USD	137.82 USD	15.18 USD	1.00 USD	16.19 USD
MULTI-SEARCH TRANSACTIONAL SEARCHES	2				430.00 USD	387.33 USD	42.67 USD	2.82 USD	45.49 USD
Totals for Included	3				583.00 USD	525.14 USD	57.86 USD	3.82 USD	61.67 USD
Totals for Day 04/01/2022	3				583.00 USD	525.14 USD	57.88 USD	3.82 USD	61.67 USD
Day 04/05/2022									
Included									
MULTI-SEARCH KEYCITE	1				0.00 USD	0.00 USD	0.00 USD	0.00 USD	0.00 USD
MULTI-SEARCH DOCUMENT DISPLAYS	17				0.00 USD	0.00 USD	0.00 USD	0.00 USD	0.00 USD
MULTI-SEARCH TRANSACTIONAL SEARCHES	16				3,440.00 USD	3,098.63 USD	341.37 USD	22.53 USD	363.91 USD
Totals for Included	34				3,440.00 USD	3,098.63 USD	341.37 USD	22.53 USD	363.91 USD
Totals for Day 04/05/2022	34				3,440.00 USD	3,098.63 USD	341.37 USD	22.53 USD	363.91 USD
Day 04/06/2022									
Included									
MULTI-SEARCH KEYCITE	3				0.00 USD	0.00 USD	0.00 USD	0.00 USD	0.00 USD
MULTI-SEARCH DOCUMENT DISPLAYS	10				438.00 USD	394.53 USD	43.47 USD	2.87 USD	46.33 USD
MULTI-SEARCH TRANSACTIONAL SEARCHES	7				1,505.00 USD	1,355.65 USD	149.35 USD	9.86 USD	159.21 USD
Totals for Day 04/06/2022	20				1,943.00 USD	1,750.18 USD	192.82 USD	12.73 USD	205.54 USD
Totals for User name ELLIOTT, C LAY (21274085)	20				1,943.00 USD	1,750.18 USD	192.82 USD	12.73 USD	205.54 USD
	57				5,966.00 USD	5,373.95 USD	592.05 USD	39.08 USD	631.12 USD
Totals for Client 18797.01	57				5,966.00 USD	5,373.95 USD	592.05 USD	39.08 USD	631.12 USD ✓

Client 18797.01									
User Name ELLIOTT,CLAY (21274085)									
Day 05/23/2022									
Included									
MULTI-SEARCH DOCUMENT DISPLAYS	4				612.00 USD	528.92 USD	83.08 USD	5.48 USD	88.57 USD
MULTI-SEARCH TRANSACTIONAL SEARCHES	3				645.00 USD	557.44 USD	87.56 USD	5.78 USD	93.34 USD
Totals for Included	7				1,257.00 USD	1,086.36 USD	170.64 USD	11.26 USD	181.90 USD
Totals for Day 05/23/2022	7				1,257.00 USD	1,086.36 USD	170.64 USD	11.26 USD	181.90 USD
Totals for User Name ELLIOTT,CLAY (21274085)	7				1,257.00 USD	1,086.36 USD	170.64 USD	11.26 USD	181.90 USD
	7				1,257.00 USD	1,086.36 USD	170.64 USD	11.26 USD	181.90 USD ✓

of 45
U.S. Bankruptcy Court
Western District of Texas
Internet Payment History for Odell, Brad W.
3/19/2022 to 4/19/2022

Date Paid	Description	Payment Method	Receipt #	Amount
2022-04-19 14:01:23	Brad W. Odell, Chapter 7 Trustee v. Techrover, Inc. et al Complaint(22-03004-hcm) [cmp,cmp] (350.00)	cr card	A22926266	\$ 350.00

ASAP Process Service LLC



Your order has been received!

SUMMARY

TECHROVER, INC (service of process)	\$154.39
Subtotal	\$154.39
Order Total	\$154.39
VISA ending in 8393	

Mullin Hoard & Brown, L.L.P.
memert@mhba.com
(806) 765-7491



Secure checkout powered by Square

ASAP Process Service LLC



Your order has been received!

SUMMARY

KEYVAN PARSA (service of process)	\$69.12
Subtotal	\$69.12
Order Total	\$69.12
VISA ending in 8393	

Mullin Hoard & Brown, L.L.P.
memert@mhba.com
(806) 765-7491



Secure checkout powered by Square

Client 18797.02						
User Name ELLIOTT, CLAY (21274085)						
Day 04/12/2022						
Included						
MULTI-SEARCH KEYCITE	4	0.00 USD	0.00 USD	0.00 USD	0.00 USD	0.00 USD
MULTI-SEARCH DOCUMENT	38	459.00 USD	413.45 USD	45.55 USD	3.01 USD	48.56 USD
DISPLAYS						
MULTI-SEARCH TRANSACTIONAL	13	2,795.00 USD	2,517.63 USD	277.37 USD	18.31 USD	295.67 USD
SEARCHES						
Totals for Included	55	3,254.00 USD	2,931.08 USD	322.92 USD	21.31 USD	344.23 USD
Totals for Day 04/12/2022	55	3,254.00 USD	2,931.08 USD	322.92 USD	21.31 USD	344.23 USD
Day 04/13/2022						
Included						
MULTI-SEARCH DOCUMENT	26	0.00 USD	0.00 USD	0.00 USD	0.00 USD	0.00 USD
DISPLAYS						
MULTI-SEARCH TRANSACTIONAL	2	430.00 USD	387.33 USD	42.67 USD	2.82 USD	45.49 USD
SEARCHES						
Totals for Included	28	430.00 USD	387.33 USD	42.67 USD	2.82 USD	45.49 USD
Totals for Day 04/13/2022	28	430.00 USD	387.33 USD	42.67 USD	2.82 USD	45.49 USD
Day 04/14/2022						
Included						
MULTI-SEARCH KEYCITE	1	0.00 USD	0.00 USD	0.00 USD	0.00 USD	0.00 USD
MULTI-SEARCH DOCUMENT	28	1,683.00 USD	1,515.98 USD	187.02 USD	11.02 USD	178.04 USD
DISPLAYS						
MULTI-SEARCH TRANSACTIONAL	12	2,580.00 USD	2,323.97 USD	256.03 USD	16.90 USD	272.93 USD
SEARCHES						

of 45

Totals for Included	41	4,263.00 USD	3,839.95 USD	423.05 USD	27.92 USD	450.97 USD
Totals for Day 04/14/2022	41	4,263.00 USD	3,839.95 USD	423.05 USD	27.92 USD	450.97 USD
Day 04/18/2022						
Included						
MULTI-SEARCH DOCUMENT DISPLAYS	11	0.00 USD	0.00 USD	0.00 USD	0.00 USD	0.00 USD
MULTI-SEARCH TRANSACTIONAL SEARCHES	5	1,075.00 USD	968.32 USD	106.68 USD	7.04 USD	113.72 USD
Totals for Included	16	1,075.00 USD	968.32 USD	106.68 USD	7.04 USD	113.72 USD
Totals for Day 04/18/2022	16	1,075.00 USD	968.32 USD	106.68 USD	7.04 USD	113.72 USD
Totals for User Name ELLIOTT,CLAY (21274085)	140	9,022.00 USD	8,126.69 USD	895.31 USD	59.09 USD	954.41 USD
1	140	9,022.00 USD	8,126.69 USD	895.31 USD	59.09 USD	954.41 USD ✓

INVOICE

Date: May 12, 2022

Invoice Number: TR-2022-4500 Frankfort

To:

Dawn Mamawal
Legal Secretary
Mullin Hoard & Brown, LLP
1500 Broadway, Suite 700
Lubbock, Texas 79401

From:


ALLEGIANCE
TITLE COMPANY
An **AllFirst.** Company

Description	Amount	Quantity	Total
Property Report – 4500 Frankfort, El Paso County, TX	\$125.00	1	\$125.00
Subtotal			\$125.00
Tax @ 8.25%			\$10.31
Non Taxable Amt.			\$0.00
Grand Total			\$135.31

Please Remit To:

**Allegiance Title Company
Accounts Receivable
15770 North Dallas Parkway, Suite 300, Dallas, TX 75248**

Thank you!

*approved by
BWO*

18797.02

INVOICE

Date: May 12, 2022

Invoice Number: TR-2022-4537 Skylark Way

To:

Dawn Mamawal
Legal Secretary
Mullin Hoard & Brown, LLP
1500 Broadway, Suite 700
Lubbock, Texas 79401

From:


ALLEGIANCE
TITLE COMPANY
An **AllFirst.** Company

Description	Amount	Quantity	Total
Property Report – 4537 Skylark Way, El Paso County, TX	\$125.00	1	\$125.00
Subtotal			\$125.00
Tax @ 8.25%			\$10.31
Non Taxable Amt.			\$0.00
Grand Total			\$135.31

Please Remit To:

**Allegiance Title Company
Accounts Receivable
15770 North Dallas Parkway, Suite 300, Dallas, TX 75248**

Thank you!

*approved by
BWB*

18797.02

INVOICE

Date: May 12, 2022

Invoice Number: TR-2022-4325 Leeds

To:

Dawn Mamawal
Legal Secretary
Mullin Hoard & Brown, LLP
1500 Broadway, Suite 700
Lubbock, Texas 79401

From:


ALLEGIANCE
TITLE COMPANY
An **AllFirst.** Company

Description	Amount	Quantity	Total
Property Report – 4325 Leeds, El Paso County, TX	\$125.00	1	\$125.00
Subtotal			\$125.00
Tax @ 8.25%			\$10.31
Non Taxable Amt.			\$0.00
Grand Total			\$135.31

Please Remit To:

**Allegiance Title Company
Accounts Receivable
15770 North Dallas Parkway, Suite 300, Dallas, TX 75248**

Thank you!

*approved by
Bwo*

1879702

INVOICE

Date: May 12, 2022

Invoice Number: TR-2022-538 East Road

To:

Dawn Mamawal
Legal Secretary
Mullin Hoard & Brown, LLP
1500 Broadway, Suite 700
Lubbock, Texas 79401

From:


ALLEGIANCE
TITLE COMPANY
An **AllFirst.** Company

Description	Amount	Quantity	Total
Property Report – 538 East Road, El Paso County, TX	\$125.00	1	\$125.00
Subtotal			\$125.00
Tax @ 8.25%			\$10.31
Non Taxable Amt.			\$0.00
Grand Total			\$135.31

Please Remit To:

Allegiance Title Company
Accounts Receivable
15770 North Dallas Parkway, Suite 300, Dallas, TX 75248

Thank you!

*approved by
BMO*

18797.02

INVOICE

Date: May 12, 2022

Invoice Number: TR-2022-71 Camille Drive

To:

Dawn Mamawal
Legal Secretary
Mullin Hoard & Brown, LLP
1500 Broadway, Suite 700
Lubbock, Texas 79401

From:



Description	Amount	Quantity	Total
Property Report – 71 Camille Drive, El Paso County, TX	\$150.00	1	\$150.00
Subtotal			\$150.00
Tax @ 8.25%			\$12.38
Non Taxable Amt.			\$0.00
Grand Total			\$162.38

Please Remit To:

Allegiance Title Company
Accounts Receivable
15770 North Dallas Parkway, Suite 300, Dallas, TX 75248

Thank you!

*Approved by
Buo*

18797.02

INVOICE

Date: May 12, 2022

Invoice Number: TR-2022-3320 Montana Ave

To:

Dawn Mamawal
Legal Secretary
Mullin Hoard & Brown, LLP
1500 Broadway, Suite 700
Lubbock, Texas 79401

From:



Description	Amount	Quantity	Total
Property Report – 3320 Montana Ave., El Paso County, TX	\$125.00	1	\$125.00
Subtotal			\$125.00
Tax @ 8.25%			\$10.31
Non Taxable Amt.			\$0.00
Grand Total			\$135.31

Please Remit To:

Allegiance Title Company
Accounts Receivable
15770 North Dallas Parkway, Suite 300, Dallas, TX 75248

Thank you!

*approved by
Bmo*

18797.02

INVOICE

Date: May 12, 2022

Invoice Number: TR-2022-9532 Charleston

To:

Dawn Mamawal
Legal Secretary
Mullin Hoard & Brown, LLP
1500 Broadway, Suite 700
Lubbock, Texas 79401

From:



Description	Amount	Quantity	Total
Property Report – 9532 Charleston, El Paso County, TX	\$125.00	1	\$125.00
Subtotal			\$125.00
Tax @ 8.25%			\$10.31
Non Taxable Amt.			\$0.00
Grand Total			\$135.31

Please Remit To:

Allegiance Title Company
Accounts Receivable
15770 North Dallas Parkway, Suite 300, Dallas, TX 75248

Thank you!

*Approved by
Baw
18797.02*

EXHIBIT “E”

James Rose
Erin Caughlin
U.S. Trustee's Office
P.O. Box 1539
San Antonio, TX 78295

Albert Flores
c/o E.P. Bud Kirk
600 Sunland Park Dr., Ste. 4-400
El Paso, TX 79912-5134

City of El Paso
c/o Don Stecker
Linebarger Goggan Blair & Sampson,
LLP
112 E. Pecan, Suite 2200
San Antonio, TX 78205-1588

WestStar Title, LLC
c/o James Brewer
221 N. Kansas, Ste. 1700
El Paso, TX 79901-1401

Fidelity National Title Ins. Co.
c/o Shakira Kelley
6900 Dallas Parkway, Ste. 610
Plano, TX 75024-7164

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